

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF ARKANSAS  
WESTERN DIVISION**

**BRENDA GLOVER, on behalf  
of herself and all others similarly  
situated,**

**PLAINTIFF**

**v.**

**CASE NO. 4:14-cv-644-JLH**

**HOUSING AUTHORITY OF THE  
CITY OF LITTLE ROCK, d/b/a  
METROPOLITAN HOUSING  
ALLIANCE, and RODNEY FORTE,  
Executive Director of Metropolitan  
Housing Alliance, in his Official Capacity,**

**DEFENDANTS**

**JOINT RULE 26(f) REPORT**

Pursuant to Federal Rule of Civil Procedure 26(f), Hank Bates, David Slade, and John C. Williams, counsel for Plaintiff, and J. Mark Davis and N. M. Norton, counsel for Defendants, conferred via telephone on April 21, 2015. The parties now submit this joint report pursuant to E.D. Ark. Local Rule 26.1.

- 1) **Any changes in timing, form, or requirements of mandatory disclosures under Fed. R. Civ. P. 26(a).** None.
- 2) **Date when mandatory disclosures were or will be made.** The parties will make their initial disclosures fourteen days from the date of the Rule 26(f) conference, May 5, 2015.
- 3) **Subjects on which discovery may be needed.** Discovery may be needed on the following subjects: (1) Defendants' policies and procedures regarding termination of Section 8 Benefits; (2) Defendants' policies and procedures regarding the process by which recipients of Section 8 Benefits may challenge termination of those Benefits; and (3) Plaintiff's damages and class allegations.

- 4) **Whether any party will likely be requested to disclose or produce information from electronic or computer-based media.** The disclosure or discovery of electronically stored information is not anticipated to be an issue in this case. To the extent that disclosure or discovery of any electronically stored information does become an issue, the parties will confer over the proper handling of same and will supplement this discovery plan accordingly.
- 5) **Date by which discovery should be completed.** The parties are in agreement with the discovery deadline of January 21, 2016, set forth in the Court's Initial Scheduling Order. The parties will endeavor to complete discovery well before that deadline.
- 6) **Any needed changes in limitations imposed by the Federal Rules of Civil Procedure.** None.
- 7) **Any orders, e.g. protective orders, which should be entered.** The parties anticipate that discovery may involve confidential information. Accordingly, the parties intend to confer and agree upon a proposed protective order to submit to the Court.
- 8) **Any objections to initial disclosures on the ground that mandatory disclosures are not appropriate in the circumstances of the action.** None.
- 9) **Any objections to the proposed trial date.** The parties do not object to the trial date set forth in the Court's Initial Scheduling Order (April 4, 2016).
- 10) **Proposed deadline for joining other parties and amending the pleadings.** The parties are in agreement with the date set forth in the Court's Initial Scheduling Order (January 5, 2016).
- 11) **Proposed deadline for completing discovery.** The parties are in agreement with the date set forth in the Court's Initial Scheduling Order (January 21, 2016).

- 12) **Proposed deadline for filing motions other than motions for class certification.** The parties are in agreement with the date set forth in the Court's Initial Scheduling Order (February 4, 2016).
- 13) **Proposed deadline for the parties to file a motion for class certification.** The parties propose that Plaintiff's motion for class certification be due on or before September 30, 2015.

Dated: May 5, 2015

Respectfully submitted,

/s/ John C. Williams /  
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**CERTIFICATE OF SERVICE**

I hereby certify that on May 5, 2015, I caused a copy of the foregoing to be electronically filed with the Clerk of Court using CM/ECF, which will send electronic notification to the parties and registered attorneys of record that the document has been filed and is available for viewing and downloading.

/s/ John C. Williams  
John C. Williams